

Application No.: 09/759,497

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**REMARKS**

Claims 1-50 stand rejected in the present Office Action. In this response, claims 1, 3-5, 7, 9-12, 14-15, 17, 19-21, 23, 25-28, 33, 35-37, 39, 41-44, and 49-50 are amended; claims 2, 6, 8, 18, 22, 24, 34, 38, and 40 are canceled without prejudice; and new claims 51-56 are added. Accordingly, claims 1, 3-5, 7, 9-16, 17, 19-21, 23, 25-33, 35-37, 39, and 41-56 are pending in the present application. Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and reasons.

**35 U.S.C. 103 rejection**

On pages 2-7 of the Office Action, claims 1-50 are rejected under 35 U.S.C. 103(a) as being unpatentable over UK published application no. 2,253,500 (Conti et al.). In particular, the Examiner stated that:

Regarding claim 1, Conti teaches "A computer implemented method for automated processing of applications by a business applications server comprising the acts of receiving a ... from a first server (page 10, line 5 to page 17, line 22, as cited by Applicant, i.e., encoded applications command routines);

translating a content of the ... into a format for processing by the business applications server (page 10, line 5 to page 17, line 22, as cited by Applicant, i.e., encoded applications command routines);

using a set of metadata to define properties and behavior of the translated content of the ... (page 10, line 5 to page 17, line 22, as cited by Applicant, i.e., metatables); and

processing the translated content of the ... using a code path defined by a persistence framework (page 10, line 5 to page 17, line 22, as cited by Applicant, i.e., linked to the odb process)." ...

Regarding claims 6-16, these claims refer to the various technologies upon which Saba products are all built. These technologies are well known in the art for the motivation of compatibility.

Each of amended independent claims 1, 17, and 33 recites, among other things, that core services are performed, in response to a method call, to permit performance of operations on a

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business object, the core services including at least an auditing service, an internationalization service, and a security service. Amended independent claim 49 recites, among other things, that core services are performed, in response to a method call, to permit performance of operations on a business object, wherein operations on the business object is prevented based on the performed core services.

In one embodiment of the present application, a business system platform architecture efficiently manages multiple applications (which may be distributed across a network) by making use of a collection of common functionality or core services applicable to all enterprise applications. Business objects utilized by applications are dependent on the core services, because the core services dictate whether a requested operation (e.g., a method call) may be performed on the business object(s). The core services "are not specific to any industry, such as learning; instead, they provide the support and functionality required by applicants to meet generic enterprise requirements."

The core services implemented in a core services module 503 provide at least an auditing service, an internationalization service, and a security service. The auditing service "tracks changes to objects in the system" and has the "ability to track the history of all changes to an object, including the date of a change, the identity of the user making the change, and a justification for the change." Such tracking data can be relevant for compiling a variety of reports, including audit reports or securities filings. The internationalization service "[t]rack[s] information about locales, languages, timezones, and display formats associated with business objects." "[M]essage content, money amounts, dates and various other culture specific data are kept in separate files in order to permit an easy change from one countries language and cultural rules to another. This comprises both storing values of business objects in multiple languages and supporting multiple formats for date, currency, and other data types that vary among countries." The security service provides "extremely fine-grained security control to control whether specific users have privileges to perform operations such as creating or viewing a particular class of business objects." The security service "provides a flexible model of security roles and security lists to assign a set of privileges to distinct groups of users, and it employs a scalable motion of domains to differentiate among sets of business

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objects.” See page 8, lines 5-12; page 10, lines 5-24; page 12, line 13-page 14, line 4; Figure 5; page 40, line 10-page 42, line 15; pages 26-28; page 130, lines 2-4.

The Examiner states that canceled claim 8, which recited core services, “refer to the various technologies upon which Saba products are all built” and that “[t]hese technologies are well known in the art for the motivation of compatibility.” Under MPEP 2144.03, it is appropriate to make assertions of common knowledge or that something is well known in the art unsupported by documentary evidence, only when the Examiner is “capable of instant and unquestionable demonstration [of the assertion] as being well-known” or when the Examiner provides “specific factual findings predicated on sound technical and scientific reasoning to support his or her conclusion of common knowledge.” Applicants respectfully request an “instant and unquestionable demonstration” or “explicit” reasons based on specific factual findings as to core services being well known in the art in the context of Applicants’ claims. Absent such demonstration or reasons, Applicants respectfully request a prior art reference that discloses the core services element as recited in claims 1, 17, 33, and 49, and a motivation to combine this new reference with Conti et al.

The utilization of core services in executing method calls automatically provides common functions required for an enterprise in an efficient manner. The core services are implemented in a core services module that adds additional complexity for the platform architecture since, among other things, a separate file, table, or database to maintain the data tracked and managed by the core services is required. The various services performed can also trigger one or more processes, such as security alerts to appropriate personnel when an unauthorized user attempts a certain operation.

The core services element, as recited in each of amended independent claims 1, 17, 33, and 49, is also not motivated by compatibility. Performing the core services in response to a method call is an additional functionality (e.g., additional data gathering, gatekeeping function, etc.) in performing operations on a business object. The core services do not relate to compatibility issues.

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Conti et al. may disclose creating and manipulating objects in an object-oriented database in a relational database context. The conversion into relational database commands may also include use of user-defined tables and meta-tables. See abstract; page 11, line 4-page 12, line 24; page 16, lines 1-11. Nevertheless, Conti et al. fails to disclose core services as recited in amended claims 1, 17, 33 and 49. Conti et al. also fails to disclose a motivation to combine the concept of core services, as recited in claims 1, 17, 33, and 49, with the disclosure in Conti et al.

The core services element, as recited in claims 1, 17, 33, and 49, is not disclosed in Conti et al. or adequately established as well known in the art. There is also no motivation shown to combine the elements as recited in claims 1, 17, 33, and 49. Accordingly, it is respectfully submitted that each of amended independent claims 1, 17, 33, and 49 is allowable over Conti et al. It is respectfully submitted that claims 3-5, 7, 9-12, 14-15, 19-21, 23, 25-28, 35-37, 39, 41-44, and 50-56, which depend from one of claims 1, 17, 33, or 49, are also allowable for at least the same reasons as for claims 1, 17, 33, and 49.

Dependent claims 7, 9-12, 14-15, 23, 25-28, 39, 41-44, and 50 are amended consistent with amended independent claims 1, 17, 33, or 49. Support for amended claims 3, 19, and 35 is found, for example, on page 45, line 24 – page 46, line 24. Support for amended claims 4, 20, and 36 is found, for example, on page 46, line 28 – page 47, line 9. Support for amended claims 5, 21, and 37 is found, for example, on page 47, line 13 – page 48, line 7. Support for new claims 51-56 is found, for example, on page 8, lines 5-12; page 10, lines 5-24; page 12, line 13-page 14, line 4; Figure 5; page 40, line 10-page 42, line 15; pages 26-28; and page 130, lines 2-4.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

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In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 360322000200. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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Respectfully submitted,

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